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October 15, 2020

Hon. Sidney H. Stein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Jimenez, et al.*
Docket No.: 18-CR-879 (SHS)

Dear Judge Stein:

I am counsel to Defendant Irelene Nunez. At the suggestion of Mr. Nunez's Pretrial Services Officer, I write to request that the Court modify Ms. Nunez's conditions of release to permit her to report to Pretrial Services via web only reporting.

By way of background, on November 14, 2018, the Hon. Barbara C. Moses ordered Ms. Nunez released on a \$150,000 personal recognizance bond secured by the signatures of two financially responsible persons. Ms. Nunez's pretrial supervision was to be as directed by Pretrial Services, and her travel was limited to the Southern and Eastern Districts of New York. Since her release 23 months ago, Ms. Nunez has remained fully compliant with all of the terms of her release.

I have spoken to the government, by AUSA Daniel Nessim, Esq., and they do not object to this request.

Your Honor's consideration is greatly appreciated.

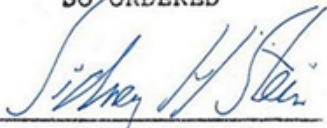
Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

Cc: AUSA Daniel Nessim, Esq.
PTSO Erin Cunningham

Request granted.

**Dated: New York, New York
October 16, 2020**

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.